

Appl. No. 09/517,903
Amdt. dated October 15, 2003
Reply to Office Action of August 15, 2003

REMARKS

In the Office Action dated August 15, 2003, claims 1, 2, 5-11, 13-18, 20-23, 26-31, 34, 36-38, 41, and 43-46 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,078,582 (Curry); and claims 3, 4, 12-14, 25-27, 38, 39, 40, 42, 47, and 48 were rejected under § 103 over Curry.

In response to Applicant's arguments presented in the Reply to the Office Action of 3/27/2003, the Examiner pointed to the abstract of Curry as teaching the encapsulation of stimulus control information. The abstract of Curry states that a communication system uses an interface server to encapsulate communication traffic and signaling data. This statement in the abstract is explained further in the specification of Curry, which clearly indicates that the signaling data being encapsulated is *not* stimulus control information.

As explained in Curry, an Internet telephony server (ITS) 72 provides an interface between a telephone system 62 and a wide area packet switched network 74 (*see* Figure 6 of Curry). More specifically, as depicted in Figure 6 of Curry, the ITS 72 is connected between a central office (CO) 41 and the network 74. The ITS 72 receives a CCIS (common channel interoffice signaling) query message from *the central office 41*. Curry, 15:14-17. It is the central office 41a disclosed in Curry that receives stimulus control information, such as an off-hook indication, key press, etc. Curry, 14:66-15:10. In response to the off-hook and dialed digits *82, the central office of Curry *suspends the call* and sends a *CCIS query message* to the ITS 72. Curry, 15:14-17. CCIS provides for signaling between end offices and tandem switching systems, such as the end offices and switching tandem systems shown in Figure 2 of Curry. A CCIS query does not constitute stimulus control information. In response to a CCIS query, the ITS 72 of Curry performs further processing, and then sends a signaling message in the form of a query message packetized in TCP/IP packets. Curry, 15:33-37. The query message packetized in TCP/IP packets, which are sent to a destination ITS 72b, also does not constitute stimulus control information. The destination ITS 72b extracts the payload from the received

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packets on behalf of the destination central office 41b. Curry 15:33-48. It is thus clear that the message carried in the TCP/IP packets exchanged between ITSs are inter-central office messages, not stimulus control information. Therefore, the ITS 72 does *not* encapsulate stimulus control information.

Moreover claim 1 recites a controller to receive *stimulus control information* from a digital interface and to *encapsulate the stimulus control information* into one or more packets. There is no indication in Curry that the CCIS query message received by the ITS 72 is actually the message encapsulated by the ITS. Thus, there is no teaching by Curry of receiving control information and encapsulating *the* control information.

Therefore, claim 1 is allowable over Curry.

With respect to independent claim 20, Curry does not disclose encapsulating stimulus control information received from a first interface that communicates stimulus control information with a stimulus device. With respect to independent claim 28, Curry does not disclose encapsulating data according to a stimulus protocol into one or more packets for communication to a packet-based network. With respect to independent claim 34, Curry does not disclose a means for encapsulating a stimulus message from a stimulus device.

With respect to independent claim 30, Curry does not disclose receiving at least one packet containing a stimulus message according to a first language, and decapsulating the at least one packet to extract the stimulus message according to the first language.

Claims 17, 18, and 37 depend from claim 1 and thus are allowable for at least the same reasons as claim 1. Furthermore, there is no teaching whatsoever within Curry that any of the specific information or commands listed in claims 17 and 18 are encapsulated in a packet. Similarly, dependent claims 41, 43, 44, and 45, which depend from independent claims 20, 28, 30, and 34, respectively, are allowable over Curry because there is no teaching by Curry of encapsulating any of the listed information or commands of claims 41, 43, 44, and 45 in a packet.


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Claims 3, 4, 12-14, 25-27, 35, 39, 40, 42, 47, and 48 were rejected as obvious over Curry. The Examiner took official notice that the missing elements were well known. Applicant respectfully disagrees that there is any suggestion anywhere in Curry or any other prior art knowledge of the modification of Curry proposed by the Examiner. If objective proof of such knowledge exists, Applicant respectfully requests production of such objective proof. Otherwise, withdrawal of the § 103 rejection is respectfully requested.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees, including extension of time fees, and/or credit any overpayment to Deposit Account No. 20-1504 (NRT.0065US).

Respectfully submitted,

10-15-03
Date


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